

EXHIBIT K

Eaton, Ellie (SF)

From: Chris Wood <CWood@rgrdlaw.com>
Sent: Tuesday, August 4, 2020 14:28
To: 'frensleychambers@tnmd.uscourts.gov'
Cc: Willow Radcliffe; Kenny Black; Christopher Lyons; Jason Forge; Grant, Melyn (LA); Glennon, Brian (LA); TMcGee@rwjplc.com; Schindler, David (LA); SRiley@rwjplc.com; Tomkowiak, Sarah (DC); Pettis, Eric (LA); Whitworth, Morgan (Bay Area)
Subject: Grae v. Corrections Corporation of America, No. 3:16-cv-02267 (M.D. Tenn.)

Your Honor:

We write on behalf of plaintiff in the above-referenced action to follow up on our phone conversation with your staff earlier today, and respectfully request a brief telephone conference to discuss refiling an amended version of Lead Plaintiff's Motion to Compel Defendants to Further Respond to Interrogatories (the "Motion"). ECF No. 254.

The Motion was filed on July 27, 2020, pursuant to the Court's July 16, 2020, Order. ECF No. 244. Since the Motion was filed, plaintiff completed the depositions of three of the individual defendants at issue in the Motion, specifically Damon Hininger (CoreCivic's CEO), David Garfinkle (CoreCivic's CFO) and Harley Lappin (CoreCivic's former CCO). Plaintiff believes that the deposition testimony of these individuals renders moot certain matters at issue in the Motion (for example, one witness confirmed that he did not rely on any documents in making statements at issue in this litigation and two witnesses confirmed that there is no responsive information not already set forth in the interrogatory responses), while also raising new issues, including issues concerning the preparation of the interrogatory responses, issues concerning the propriety of instructions not to answer questions about the preparation of the interrogatory responses, issues relating to privilege and work-product waivers, and issues concerning evidence preclusion, among others.

Rather than have the Court resolve questions on a now-incomplete record, plaintiff respectfully requests that it be allowed to: (i) withdraw the Motion; (ii) meet and confer with Defendants regarding the remaining disputes at issue; and (iii) in the event that the parties are unable to resolve their disputes following their additional meet and confer efforts, submit an amended motion within seven days of when the parties reach an impasse.

We are available to discuss these matters at the Court's convenience.

Respectfully Submitted,

Chris Wood
Robbins Geller Rudman & Dowd LLP
414 Union St., Suite #900
Nashville, TN 37219
Tel 615 244 2203 | Fax 615 252 3798

NOTICE: This email message is for the sole use of the intended recipient(s) and may contain information that is confidential and protected from disclosure by the attorney-client privilege, as attorney work product, or by other applicable privileges. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message.